

DOE Increases TINA Threshold

Written by Nick Sanders
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If you haven't yet revised your command media to raise the TINA and CAS thresholds from \$750,000 to \$2 million, and if you haven't yet requested that your existing contracts be modified to implement the new thresholds, then we think you are negligent and that you should get moving before the boss finds somebody else who can stay on top of regulatory changes.

Just sayin'.

On May 31, 2018, the Department of Energy [released](#) an official Class Deviation, taking advantage of the CAAC [Class Deviation](#), to implement the increased thresholds. So now both DoD and DOE have provided pathways to increase the thresholds for (1) micropurchases, (2) requiring certified cost or pricing data from subcontractors, and (3) administering CAS on subcontracts.

As the DOE Class Deviation states, "The threshold increase excludes contracts entered into on or before June 30, 2018 [BUT] Contractors may request modifications to earlier contracts (without consideration) to use the threshold increase."

"*Without consideration.*" In other words, there's no reason not to request the modifications.

Why aren't you taking advantage of the reduced requirements?